

EXHIBIT 25

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

- - -

IN RE: JOHNSON & JOHNSON :
TALCUM POWDER PRODUCTS :
MARKETING, SALES PRACTICES, :
AND PRODUCTS LIABILITY :
LITIGATION :

THIS DOCUMENT RELATES TO: : MDL No. 16-2738
: (FLW) (LHG)
HILARY CONVERSE, et al., :
Plaintiff, : Case No. 3:18-cv-
v. : 17586-FLW-LHG
JOHNSON & JOHNSON, et al., :
Defendants. :

- - -

DECEMBER 1, 2020

- - -

Remote Oral Deposition,
taken via Zoom, of HILARY CONVERSE,
commencing at 10:14 a.m., on the above
date, before Amanda Maslynsky-Miller,
Realtime Reporter and Certified Court
Reporter for the State of New Jersey.

- - -

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APPEARANCES:

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DEPOSITION SUPPORT INDEX

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Direction to Witness Not to Answer

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None

Request for Production of Documents

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Stipulations

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5 1

Question Marked

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None

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I N D E X

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Testimony of: HILARY CONVERSE

By Ms. Mims 6

By Ms. Garber 179

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E X H I B I T S

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NO.	DESCRIPTION	PAGE
Converse-1	No Bates	
	Defendants Johnson &	
	Johnson and Johnson &	
	Johnson Consumer Inc.'s	
	Notice of Videoconference	
	Oral Deposition of	
	Hilary Converse and	
	Subpoena Duces Tecum	20
Converse-2	No Bates	
	Plaintiff Profile Form	23
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Converse-3	No Bates	
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	Form	32
Converse-4	No Bates	
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(It is hereby stipulated and

agreed by and between counsel that

sealing, filing and certification

are waived; and that all

objections, except as to the form

of the question, will be reserved

until the time of trial.)

- - -

COURT REPORTER: All parties

to this deposition are appearing

remotely and have agreed to the

witness being sworn in remotely.

Due to the nature of remote

reporting, please pause briefly

before speaking to ensure all

parties are heard completely.

Counsel, I will note your

appearances for the record and

swear in the witness.

- - -

HILARY CONVERSE, after

having been duly sworn, was

examined and testified as follows:

<p style="text-align: right;">Page 130</p> <p>1 birth control pills?</p> <p>2 A. I took -- I probably started</p> <p>3 taking birth control pills when I was</p> <p>4 about 18. And then I took them until I</p> <p>5 was trying to get pregnant. So that</p> <p>6 was -- would have made me about 23,</p> <p>7 24ish.</p> <p>8 And then I took them again</p> <p>9 for probably four or five years until I</p> <p>10 was trying to get pregnant again. Then I</p> <p>11 stopped taking them.</p> <p>12 And then when I was</p> <p>13 breastfeeding my son, I used a diaphragm</p> <p>14 from -- until I stopped breastfeeding him</p> <p>15 and then went back on the pill, probably</p> <p>16 for another two or three years, until my</p> <p>17 husband got a vasectomy.</p> <p>18 Q. Have you ever had a tubal</p> <p>19 ligation?</p> <p>20 A. No.</p> <p>21 Q. Who prescribed the birth</p> <p>22 control pills for you?</p> <p>23 A. The gynecologist.</p> <p>24 Q. Would that have been Dr.</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. All right. Now, you did</p> <p>2 mention that you used a diaphragm for a</p> <p>3 little while.</p> <p>4 A. I did.</p> <p>5 Q. About how long?</p> <p>6 A. Probably about a year. A</p> <p>7 year or a little more than that.</p> <p>8 Q. Did you ever apply any type</p> <p>9 of powder to the diaphragm?</p> <p>10 A. I did. Per the directions</p> <p>11 of the day, you were supposed to wash it</p> <p>12 off and then put powder on it and then</p> <p>13 put it back in the container.</p> <p>14 Q. And what type of powder did</p> <p>15 you put on it?</p> <p>16 A. I used the Johnson's baby</p> <p>17 powder.</p> <p>18 Q. And was that your process</p> <p>19 for the year in which you used the</p> <p>20 diaphragm?</p> <p>21 A. Yes.</p> <p>22 Q. Now, I asked you earlier if</p> <p>23 you recalled the type of hormone</p> <p>24 replacement therapy that you had used,</p>
<p style="text-align: right;">Page 131</p> <p>1 Fine?</p> <p>2 A. No. Then -- I wasn't seeing</p> <p>3 her then. I was seeing a Dr. Lowell</p> <p>4 Olson at that time.</p> <p>5 Q. Lowell Olson, is that the</p> <p>6 name of the practice?</p> <p>7 A. Pardon?</p> <p>8 Q. Is Lowell Olson the name of</p> <p>9 the practice?</p> <p>10 A. It was Molumphy and Olson,</p> <p>11 and they were in New Haven. But this was</p> <p>12 a million years ago. And I think they've</p> <p>13 both passed away.</p> <p>14 Q. Have you ever had any</p> <p>15 injectable or implanted hormonal</p> <p>16 contraceptives?</p> <p>17 A. No.</p> <p>18 Q. And just to make sure we're</p> <p>19 clear on that, I mean Depo-Provera,</p> <p>20 Norplant.</p> <p>21 Anything like that?</p> <p>22 A. No.</p> <p>23 Q. Have you ever used IUDs?</p> <p>24 A. No, I don't think so.</p>	<p style="text-align: right;">Page 133</p> <p>1 and I'm going to go through some names</p> <p>2 with you. And if you can tell me if you</p> <p>3 remember whether you used these or not.</p> <p>4 A. Okay.</p> <p>5 Q. Estradiol?</p> <p>6 A. That sounds familiar.</p> <p>7 Q. Provera?</p> <p>8 A. Would those two have been</p> <p>9 taken at the same -- taken together, or</p> <p>10 were they separate?</p> <p>11 Q. Let me ask it in this way:</p> <p>12 If the medical record indicates that [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED] do you have any reason to</p> <p>15 disagree with that?</p> <p>16 A. I don't think so.</p> <p>17 Q. Do you recall using</p> <p>18 progesterone with the name Prometrium?</p> <p>19 A. That sounds familiar.</p> <p>20 Q. Have you ever used any</p> <p>21 fertility treatments?</p> <p>22 A. No.</p> <p>23 Q. If the medical records also</p> <p>24</p>

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1 indicate that [REDACTED]
2 [REDACTED]
3 does that sound right?
4 A. Until [REDACTED]? Yeah, well, I
5 didn't think it was quite [REDACTED]. But
6 2007 is when I had the surgery, so that
7 is probably right.
8 Q. Did you ever use any
9 douching products?
10 A. No.
11 Q. Have you ever been diagnosed
12 with endometriosis?
13 A. No.
14 Q. Other than your -- you know,
15 prior to being diagnosed with ovarian
16 cancer, did you ever need to see a
17 gynecologist for any other problems over
18 your lifetime?
19 A. Nothing is jumping out at
20 me.
21 Q. Now, you've mentioned Dr.
22 Fine and also a gynecologist at the
23 Lowell Olson practice.
24 Can you tell me the name of

Page 136

1 you smoke?
2 A. I smoked sometimes, I think,
3 Newports and sometimes Marlboro Lights.
4 Q. Does your husband smoke?
5 A. No.
6 Q. Did he ever smoke?
7 A. He did.
8 Q. When did he smoke?
9 A. He started later. I'm not
10 sure. I think he was in his early 20s.
11 I'm not sure. And he stopped about 14
12 years ago. And he's 74 now.
13 Q. And when you were smoking,
14 how much did you smoke per day?
15 A. About a half a pack to a
16 pack a day.
17 Q. When your husband was
18 smoking, about how much did he smoke a
19 day?
20 A. I think about the same.
21 Q. If you started smoking when
22 you were 16 and stopped in your early
23 40s, is it fair to say that you smoked
24 for approximately 25 years or so?

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1 any other gynecologists or obstetricians
2 that you've seen over your lifetime that
3 you can recall as you sit here today?
4 A. Well, obstetrician, I also
5 saw Dr. Olson's partner, Dr. Molumphy, in
6 that practice, because they were the two
7 who delivered my children.
8 I did see someone at Sloan
9 Kettering when I had cancer. I don't
10 remember his name.
11 And I don't recall any other
12 ones.
13 Q. Thank you.
14 You are a prior smoker; is
15 that correct?
16 A. Yes.
17 Q. And when did you begin
18 smoking?
19 A. I was probably about 16.
20 Q. About how old were you when
21 you stopped?
22 A. Maybe 40, early 40s, I
23 think.
24 Q. What brand of cigarettes did

Page 137

1 A. I think so.
2 Q. What has been your heaviest
3 weight in adulthood, prior to being
4 diagnosed with ovarian cancer?
5 A. I would say somewhere
6 between 150 and 160.
7 Q. Have you ever been told by
8 any healthcare provider that you need to
9 lose weight?
10 MS. GARBEN: Object to the
11 form.
12 THE WITNESS: No.
13 BY MS. MIMS:
14 Q. Have you ever taken any
15 medication to address any weight issues?
16 A. No.
17 Q. Has any physician ever told
18 you to -- that you needed to exercise?
19 A. Yes.
20 Q. Have they ever told you that
21 you needed to exercise more? I'm sorry,
22 strike that. Let me just strike that
23 one.
24 What physician has told you

35 (Pages 134 to 137)

<p>Page 198</p> <p>1 believe it said, can cause lung cancer or 2 something to that effect. 3 Q. Did it ever say anything 4 about associated with risk of ovarian 5 cancer -- 6 A. No. 7 Q. -- or was it limited to lung 8 cancer? What's your understanding? 9 MS. MIMS: Object to the 10 form. 11 THE WITNESS: My 12 understanding was it was based on 13 lung cancer. 14 BY MS. GARBER: 15 Q. And even though there was a 16 risk associated with lung cancer, you 17 continued to smoke -- strike that. 18 And even though you saw a 19 warning about the association with lung 20 cancer, you continued to smoke over the 21 years; is that true, Ms. Converse? 22 A. Yes. 23 Q. Can you tell us why you 24 continued to do that?</p>	<p>Page 200</p> <p>1 CERTIFICATE 2 3 I, Amanda Maslynsky-Miller, Certified 4 Realtime Reporter, do hereby certify that 5 prior to the commencement of the examination, 6 HILARY CONVERSE, was remotely sworn by me to 7 testify to the truth, the whole truth and 8 nothing but the truth. 9 10 I DO FURTHER CERTIFY that the foregoing is a 11 verbatim transcript of the testimony as taken 12 stenographically by me at the time, place and 13 on the date hereinbefore set forth, to the 14 best of my ability. 15 16 I DO FURTHER CERTIFY that I am neither a 17 relative nor employee nor attorney nor 18 counsel of any of the parties to this action, 19 and that I am neither a relative nor employee 20 of such attorney or counsel, and that I am 21 not financially interested in the action. 22 23 24 Amanda Miller Certified Realtime Reporter Dated: December 10, 2020 (The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)</p>
<p>Page 199</p> <p>1 A. I tried to stop smoking many 2 times. I was extremely addicted to 3 cigarettes, and it just took me many, 4 many years before I finally was able to 5 stop. I was just totally addicted. 6 MS. GARBER: Thank you. I 7 don't have anything further. 8 MS. MIMS: I don't have any 9 follow-up. 10 MS. GARBER: All right. I 11 think we're finished. We'll go 12 off the record. 13 - - - 14 (Whereupon, the deposition 15 concluded at 3:31 p.m.) 16 - - - 17 18 19 20 21 22 23 24</p>	<p>Page 201</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition 4 over carefully and make any necessary 5 corrections. You should state the reason 6 in the appropriate space on the errata 7 sheet for any corrections that are made. 8 After doing so, please sign 9 the errata sheet and date it. 10 You are signing same subject 11 to the changes you have noted on the 12 errata sheet, which will be attached to 13 your deposition. 14 It is imperative that you 15 return the original errata sheet to the 16 deposing attorney within thirty (30) days 17 of receipt of the deposition transcript 18 by you. If you fail to do so, the 19 deposition transcript may be deemed to be 20 accurate and may be used in court. 21 22 23 24</p>